



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI  
GOVERNOR

DAVID P. LITTELL  
COMMISSIONER

**Robbins Lumber, Inc.  
Waldo County  
Searsmont, Maine  
A-156-70-C-R**

**Departmental  
Findings of Fact and Order  
Part 70 Air Emission License**

After review of the Part 70 License application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A, §344 and §590, the Department finds the following facts:

**I. REGISTRATION**

**A. Introduction**

FACILITY	Robbins Lumber, Inc. (Robbins Lumber)
LICENSE NUMBER	A-156-70-C-R
LICENSE TYPE	Part 70 License Renewal
NAICS CODES	321912, 321113, 321999
NATURE OF BUSINESS	Lumber Manufacturing
FACILITY LOCATION	Ghent Road, Searsmont
LICENSE ISSUANCE DATE	November 20, 2009
LICENSE EXPIRATION DATE	November 20, 2014

**B. Emission Equipment**

The following emission units are addressed in this Part 70 License:

EMISSION UNIT ID	UNIT CAPACITY	UNIT TYPE
Boiler 1	21.3 MMBtu/hr	Wood burning boiler
Boiler 2	49.3 MMBtu/hr	Wood burning boiler
Generator	18.7 MMBtu/hr	Diesel fuel generator (1800 kw)
Drying Kilns	40 MMBF/yr	Wood drying kilns
Process Cyclones		Shaving Silo (Planer Mill #2) Cyclone, Main Silo #1 Cyclone, Main Silo #2 Cyclone, Bagger #1 Cyclone, Bagger #2 Cyclone, Planer Mill #3 Cyclone, Cut-Up Shop Cyclone, Sawmill Resaw Cyclone, Trimmer and Sawmill Cyclone

AUGUSTA  
17 STATE HOUSE STATION  
AUGUSTA, MAINE 04333-0017  
(207) 287-7688 FAX: (207) 287-7826  
RAY BLDG., HOSPITAL ST.

BANGOR  
106 HOGAN ROAD, SUITE 6  
BANGOR, MAINE 04401  
(207) 941-4570 FAX: (207) 941-4584

PORTLAND  
312 CANCO ROAD  
PORTLAND, MAINE 04103  
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE  
1235 CENTRAL DRIVE, SKYWAY PARK  
PRESQUE ISLE, MAINE 04679-2094  
(207) 764-0477 FAX: (207) 760-3143

Biocide Dipping Process	700 gal/yr of biocide	4200 gallon dipping tank
Parts Washer	15 gallon degreaser	Citrus based degreaser

Robbins Lumber has additional insignificant activities which do not need to be listed in the emission equipment table above. The list of insignificant activities can be found in the Part 70 license application and in Appendix B of *Part 70 Air Emission License Regulations*, 06-096 CMR 140 (last amended December 24, 2005). As an informational note: the ink labeling process that imprints ink on the board ends for inventory purposes uses 10-15 gallons of ink per year and the inking process that coats the board ends with a Houdini ink which disappears over time uses 10-15 gallons per year. The ink labeling process uses less than 50 gallons of coating and is therefore considered insignificant per 06-096 CMR 140 Appendix B, Section (B)(11). Should the ink labeling process increase ink usage over 50 gallons of coating, Robbins Lumber must amend the license to include this process.

C. Application Classification

The application for Robbins Lumber does not include the licensing of increased emissions or the installation of new or modified equipment, therefore the license is considered to be Part 70 License renewal issued under 06-096 CMR 140.

This license corrects a typographical error in the lb/hr NO<sub>x</sub> number listed for Boiler #2 from 44.9 lb/hr to 14.9 lb/hr and removes the spray booths which were at a separate location but included in the initial Title V license (they are now addressed in a different license).

D. Units of Measurements Referenced in this License

BF	Board Feet (one board foot = 1 foot x 1 foot x 1 inch)
gal/yr	gallons per year
lb/hr	pounds per hour
lb/MMBtu	pounds per million British Thermal Units
MMBF/yr	million board feet per year
MMBtu/hr	million British Thermal Units per hour
tpy	tons per year

II. FACILITY AND EMISSION UNIT DESCRIPTION

A. Process Description

Robbins Lumber produces lumber from white pine. Logs are brought on-site, weighed and catalogued via a computer system. The logs then go through a ring debarker, with a separate ring debarker used for the larger diameter logs. The logs are scanned for iron then go to one of two tracks (each track is the same).

The log goes through an automated, computer controlled band saw. The boards from the band saw then go through an optimizing edger, a sorter, and on to air dry storage. Following this initial storage, the boards are sent through the drying kilns and then to a dry storage. From dry storage, the boards go to the computerized planer mill. During the process, board ends are imprinted with codes for identification and inventory. A dipping area is sometimes used to prevent 'stain' on the boards. In the final stage, the boards are stacked and shipped to customers.

The wood waste from the process is either used on-site or sold. The sawmill waste is conveyed and sized. The sawdust is either sold or used as boiler fuel. Slabs are chipped and the chips are sold. An enclosed hammer mill for bark processing is located at the site and the bark is sold as land mulch. The wood waste from the planing operation is shredded for boiler fuel and the shavings are sold.

The fuel mixture for the boilers includes the whole tree chips from the lumbering operation, the sawmill waste, and the planer mill waste. The fuel storage area is covered with a roof and three sides.

Robbins Lumber also operates equipment in a separate building located several miles away from the main facility. Spray booths are used in that location to add a primer coat to what eventually becomes finished wood products. The spray booth operations were included in the previous license and continue to be included in this license.

B. Best Practical Treatment (BPT)

Robbins Lumber submitted a BPT analysis as part of the renewal application for Boilers #1 and #2, the diesel generator, the drying kilns, the process cyclones, and the minor volatile organic compound (VOC) sources. The BPT findings are incorporated in this license.

C. NO<sub>x</sub> RACT (Reasonably Available Control Technology)

*Reasonably Available Control Technology for Facilities that Emit Nitrogen Oxides*, 06-096 CMR 138 (effective August 3, 1994) is applicable to sources that have the potential to emit quantities of NO<sub>x</sub> equal to or greater than 100 tons/year. Robbins Lumber has federally enforceable fuel limits that restrict the facility to less than 100 tons of NO<sub>x</sub>/year, therefore 06-096 CMR 138 is not applicable.

D. VOC RACT (Reasonably Available Control Technology)

*Reasonably Available Control Technology for Facilities that Emit Volatile Organic Compounds*, 06-096 CMR 134 (last amended February 15, 1995) is applicable to sources that have the potential to emit quantities of VOC equal to or greater than 40 tons/year, except for exempt equipment or processes. Robbins Lumber has VOC emission limits greater than 40 tons/year, however indirect contact wood kilns are exempt when determining the facility's total VOC emissions for the purposes of 06-096 CMR 134. Excluding the kiln emissions Robbins Lumber is below the 40 tons VOC/year threshold, therefore 06-096 CMR 134 is not applicable.

E. Compliance Assurance Monitoring (CAM)

40 CFR Part 64, CAM is applicable to units at major sources if the unit has emission limits, a control device to meet the limits, and pre-control emissions greater than 100 tons/year for any pollutant. Boiler #2 has licensed CO emissions over 100 tons/year, however add-on control devices are not required for CO from Boiler #2. Therefore, Robbins Lumber is not subject to CAM.

F. Boiler #1

Boiler #1 was manufactured by the Industrial Boiler Co. in 1976 with a maximum design heat input of 21.3 MMBtu/hr firing wood waste. The wood waste consists of wood chips with smaller amounts of sawdust and other wood residue. The boiler was installed prior to the 1989 applicability date, therefore Boiler #1 is not subject to New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small-Industrial-Commercial-Institutional Steam Generating Units*. Emissions exhaust through a 65.4 foot stack.

Total fuel use for Boiler #1 and Boiler #2 combined shall be limited to 48,000 tons/year of wet wood based on a 12 month rolling total.

*Control Equipment*

Boiler #1 is controlled by two ZURN multiple cyclone separators in series.

*Streamlining*

1. Opacity

*Visible Emission Regulation*, 06-096 CMR 101 (last amended May 18, 2003), §2(B)(1)(e) contains the applicable opacity standard of 30% recorded as six (6) minute block averages, except for no more than two (2) six (6) minute block averages in a 3-hour block period.

No streamlining is required for the opacity limit for Boiler #1.

2. Particulate Matter (PM)
  - a. *Fuel Burning Equipment Particulate Emission Standard*, 06-096 CMR 103 (last amended January 24, 1983), §2(A)(3) contains a lb/MMBtu limit for PM (0.49 lb/MMBtu).
  - b. BPT establishes the applicable PM lb/MMBtu limit (0.2 lb/MMBtu).
  - c. BPT establishes the applicable PM lb/hr limit (4.3 lb/hr).

Robbins Lumber accepts streamlining for the PM lb/MMBtu limit; the more restrictive BPT limit shall apply. No streamlining is required for the PM lb/hr limit for Boiler #1.

3. Particulate Matter, 10 microns and under (PM<sub>10</sub>)  
BPT establishes the applicable PM<sub>10</sub> lb/hr limit (4.3 lb/hr).

No streamlining is required for the PM<sub>10</sub> lb/hr limit for Boiler #1.

4. Sulfur Dioxide (SO<sub>2</sub>)  
BPT establishes the applicable SO<sub>2</sub> lb/hr limit (0.2 lb/hr).

No streamlining is required for the SO<sub>2</sub> lb/hr limit for Boiler #1.

5. Nitrogen Oxide (NO<sub>x</sub>)
  - a. BPT establishes the applicable NO<sub>x</sub> lb/MMBtu limit (0.3 lb/MMBtu).
  - b. BPT establishes the applicable NO<sub>x</sub> lb/hr limit (6.5 lb/hr).

No streamlining is required for the NO<sub>x</sub> limit for Boiler #1.

6. Carbon Monoxide (CO)  
BPT establishes the applicable CO lb/hr limit (7.1 lb/hr).

No streamlining is required for the CO limit for Boiler #1.

7. Volatile Organic Compounds (VOC)  
BPT establishes the applicable VOC lb/hr limit (2.1 lb/hr).

No streamlining is required for the VOC limit for Boiler #1.

*Periodic Monitoring*

Fuel Use

Periodic monitoring shall include recordkeeping of monthly and 12 month rolling totals of the wood waste fired. Fuel usage shall be quantified by weighing all of the fuel wood waste prior to putting it into the fuel storage building and maintaining a record of the quantity of fuel stored.

Multicyclone Maintenance

Periodic monitoring shall include a multicyclone maintenance log. Robbins Lumber shall inspect operations of the multicyclones once a month and shall record the inspection findings. The maintenance log shall contain information on maintenance, failures, and corrective action

*Parameter Monitors, CEMS, and COMS*

There are no Parameter Monitors, CEMS (continuous emission monitoring system) or COMS (continuous opacity monitoring system) required for Boiler #1.

G. Boiler #2

Boiler #2, typically used as the main boiler, was manufactured by the Industrial Boiler Co. in 1986 with a maximum design heat input of 49.33 MMBtu/hr firing wood waste. The wood waste consists of wood chips with smaller amounts of sawdust and other wood residue. Boiler #2 may also fire specification waste oil mixed with the wood waste. The boiler was installed prior to the 1989 applicability date, therefore Boiler #2 is not subject to New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small-Industrial-Commercial-Institutional Steam Generating Units*. Emissions exhaust through a 73.33 foot stack.

Boiler #2 went through minor new source review in air emission license A-156-72-C-A/R (April 28, 1988). The NO<sub>x</sub> emission limit was updated in A-156-74-D-R (September 21, 1995).

Total fuel use for Boiler #1 and Boiler #2 combined shall be limited to 48,000 tons/year of wet wood based on a 12 month rolling total.

Boiler #2 may burn up to 200 gallons per month (2400 gallons per year on a 12 month rolling total) of specification waste oil generated by the Robbins Lumber Searsmont facility. A sample waste oil test result shall be kept on file at the facility demonstrating compliance with the requirements of specification waste oil. Upon the Department's request, Robbins Lumber shall test additional

representative samples of the waste oil to demonstrate that the oil being burned continues to meet the requirements of specification waste oil.

*Control Equipment*

Boiler #2 is controlled by two ZURN multiple cyclone separators in series.

*Streamlining*

1. Opacity  
06-096 CMR 101, §2(B)(1)(e) contains the applicable opacity standard of 30% on a six (6) minute block averages, except for no more than two (2) six (6) minute block averages in a 3-hour block period.

No streamlining is required for the opacity limit for Boiler #2.

2. Particulate Matter (PM)
  - a. *Fuel Burning Equipment Particulate Emission Standard*, 06-096 CMR 103 (last amended January 24, 1983), §2(B)(4)(a) contains a lb/MMBtu limit for PM (0.3 lb/MMBtu).
  - b. BPT establishes the applicable PM lb/MMBtu limit (0.2 lb/MMBtu).
  - c. BPT establishes the applicable PM lb/hr limit (9.9 lb/hr).

Robbins Lumber accepts streamlining for the PM lb/MMBtu limit; the more restrictive BPT limit shall apply. No streamlining is required for the PM lb/hr limit for Boiler #2.

3. Particulate Matter, 10 microns and under (PM<sub>10</sub>)  
BPT establishes the applicable PM<sub>10</sub> lb/hr limit (9.9 lb/hr).

No streamlining is required for the PM<sub>10</sub> lb/hr limit for Boiler #2.

4. Sulfur Dioxide (SO<sub>2</sub>)  
BPT establishes the applicable SO<sub>2</sub> lb/hr limit (0.4 lb/hr).

No streamlining is required for the SO<sub>2</sub> lb/hr limit for Boiler #2.

5. Nitrogen Oxide (NO<sub>x</sub>)
  - a. BPT establishes the applicable NO<sub>x</sub> lb/MMBtu limit (0.3 lb/MMBtu).
  - b. BPT establishes the applicable NO<sub>x</sub> lb/hr limit (14.9 lb/hr).

No streamlining is required for the NO<sub>x</sub> limit for Boiler #2.

6. Carbon Monoxide (CO)  
BPT establishes the applicable CO lb/hr limit (36.8 lb/hr).

No streamlining is required for the CO limit for Boiler #2.

7. Volatile Organic Compounds (VOC)  
BPT establishes the applicable VOC lb/hr limit (4.9 lb/hr).

No streamlining is required for the VOC limit for Boiler #2.

#### *Periodic Monitoring*

##### *Fuel Use*

Periodic monitoring shall include recordkeeping of monthly and 12 month rolling totals of the wood waste fired. Fuel usage shall be quantified by weighing all of the fuel wood waste prior to putting it into the fuel storage building and maintaining a record of the quantity of stored fuel.

Periodic monitoring shall include recordkeeping of monthly and 12 month rolling totals of the waste oil fired in Boiler #2.

##### *Multicyclone Maintenance*

Periodic monitoring shall include a multicyclone maintenance log. Robbins Lumber shall inspect operations of the multicyclones once a month and shall record the inspection findings. The maintenance log shall contain information on maintenance, failures, and corrective action

#### *Parameter Monitors, CEMS, and COMS*

There are no Parameter Monitors, CEMS (continuous emission monitoring system) or COMS (continuous opacity monitoring system) required for Boiler #2.

#### *Stack Testing*

Robbins Lumber shall perform PM stack testing on Boiler #2 one time during the term of this license using the appropriate EPA test methods.

#### H. Generator

The diesel Caterpillar 3516B generator and engine set, installed in 2001, has a capacity of 18.7 MMBtu/hr. The generator is used to assist in offsetting purchased power and is used as back-up and emergency use when the boilers are down. The generator fires diesel fuel with a sulfur content not to exceed 0.05%



and has an operating limit of 1200 hours a year, based on a 12 month rolling total. The generator is equipped with an hour meter.

The generator went through a BACT analysis in air emission license amendment A-156-71-N-A (November 20, 2001), and updated emission calculations for NO<sub>x</sub>, CO, and VOC were used to establish the limits in the initial Title V license A-156-70-A-I (December 20, 2002). The most recent emission limits are considered BPT for this renewal.

#### *Control Equipment*

The generator utilizes combustion controls and low NO<sub>x</sub> technology specific to the Caterpillar B series to minimize emissions.

#### *Streamlining*

1. Opacity  
06-096 CMR 101, §2(B)(1)(d) contains the applicable opacity standard of 20% on a six (6) minute block averages, except for no more than two (2) six (6) minute block averages in a 3-hour block period.

No streamlining is required for the opacity limit for the generator.

2. Particulate Matter (PM)
  - a. 06-096 CMR 103, §2(B)(1)(a) contains the applicable lb/MMBtu limit for PM (0.12 lb/MMBtu).
  - b. BPT establishes the applicable PM lb/hr limit (2.2 lb/hr).

No streamlining is required for the PM limits from the generator.

3. Particulate Matter, 10 microns and under (PM<sub>10</sub>)  
BPT establishes the applicable PM<sub>10</sub> lb/hr limit (2.2 lb/hr).

No streamlining is required for the PM<sub>10</sub> limit from the generator.

4. Sulfur Dioxide (SO<sub>2</sub>)
  - a. *Low Sulfur Fuel*, 06-096 CMR 106 (last amended July 4, 1999) contains an applicable fuel sulfur content standard (2%).
  - b. BPT requires the use of diesel fuel oil with a sulfur content of no greater than 0.05% for the generator.
  - c. BPT establishes the applicable SO<sub>2</sub> lb/hr limit (1.0 lb/hr).

Robbins Lumber accepts streamlining for the fuel sulfur requirement for the generator, therefore only the more stringent BPT requirement is included in this license. No streamlining is required for the SO<sub>2</sub> lb/hr limit.

5. Nitrogen Oxide (NO<sub>x</sub>)

BPT establishes the applicable NO<sub>x</sub> lb/hr limit (35.5 lb/hr). Emissions were based on the AP-42 factor of 1.9 lb/MMBtu found in Table 3.4-1 (dated 10/96).

No streamlining is required for the NO<sub>x</sub> limit from the generator.

6. Carbon Monoxide (CO)

BPT establishes the applicable CO lb/hr limit (15.9 lb/hr). Emissions were based on the AP-42 factor of 0.85 lb/MMBtu found in Table 3.4-1 (dated 10/96).

No streamlining is required for the CO limit from the generator.

7. Volatile Organic Compounds (VOC)

BPT establishes the applicable VOC lb/hr limit (1.7 lb/hr). Emissions were based on the AP-42 factor of 0.85 lb/MMBtu found in Table 3.4-1 (dated 10/96).

No streamlining is required for the VOC limit from the generator.

*Periodic Monitoring*

Periodic monitoring for the generator shall include recordkeeping to document the hours of operation on a monthly and a 12 month rolling total basis. Documentation shall also be kept on the type of fuel used and the fuel sulfur content.

*Parameter Monitors, CEMS, and COMS*

There are no Parameter Monitors, CEMS (continuous emission monitoring system) or COMS (continuous opacity monitoring system) required for the generator.

I. Drying Kilns

Robbins Lumber currently processes exclusively white pine boards in its drying kilns. The 10 kilns have a total volume of approximately 675,000 board feet (BF). Robbins Lumber processes approximately 25 MMBF of white pine per year.

Kiln operations emit VOC emissions. Robbins Lumber is limited to dry 40 MMBF/year of white pine or other wood species. Using a factor of 2.26 lb of VOC/1000 BF of white pine dried (the highest factor from all of the species of northeast wood), the Robbins Lumber kilns are licensed at 45.2 tons VOC/year.

*Control Equipment*

At this time, control devices are not practical for the kiln exhaust. VOC emissions are minimized through proper operation and maintenance of the kilns.

*Periodic Monitoring*

Periodic monitoring for the drying kilns shall include recordkeeping to document the quantity of wood dried in board feet, on a monthly and 12 month rolling total basis.

J. Blowers, Conveyors, Cyclones, and Silos

Robbins Lumber operates process cyclones throughout the facility for capturing wood dust, shavings, and other small wood particles that are suspended in air exhaust streams. Blowers convey the wood waste from the process equipment (including saws, planers, and wood conveying belts) through the cyclones. The material passes through the cyclones and continues on to silos for storage or to another final use. The cyclones vent to the atmosphere.

The Sawmill Resaw Cyclone handles particulate matter from the sawmill and discharges to be resold or for use in the boiler as fuel. The Shaving Silo (Planer Mill #2) Cyclone and the Cut-up Shop (Value-Added Shop) Cyclone both discharge to the Main Silo #1 via the Main Silo #1 Cyclone. The Main silo feeds shavings to the Bagger #1 via the Bagger #1 Cyclone where the shavings are bagged for resale. The Planner Mill #3 discharges to the Main Silo #2 via the Main Silo #2 Cyclone. The Main Silo #2 feeds shavings to the Bagger #2 via the Bagger #2 Cyclone where the shavings are bagged for resale. The Trimmer and Sawmill Cyclone handles particulate generated from the trimmer and sawmill operations and deposits it into the sawdust/bark house.

*Streamlining*

Opacity

1. 06-096 CMR 101, §2(B)(3)(d) contains an applicable opacity standard of 20% on a six (6) minute block average, except for no more than one (1) six (6) minute block average in a 1-hour period.
2. BPT establishes an applicable opacity limit of 10% opacity on a 6-minute block average.

Robbins Lumber accepts streamlining for the opacity limit on the process cyclones and wood waste conveyor systems, therefore only the more stringent BPT requirement is included in this license.

*Periodic Monitoring*

Periodic monitoring for the process blower and cyclone systems shall include a maintenance log of the conditions of the systems and the silos. Robbins Lumber shall inspect operations of the blower and cyclone systems and the silos once a month and shall record the inspection findings.

K. Biocide Dipping Unit

The biocide dipping process is used by Robbins Lumber to prevent fungal growth causing wood deterioration or stains on lumber that will be held over in storage for a period of time before being processed. The dip tank has a 4200 gallon capacity. There is also a 5000 gallon storage tank to store biocide over the winter to prevent freezing. Typically, Robbins Lumber uses approximately 100 to 200 gallons of biocide per year.

The biocide used by Robbins Lumber is normally mixed with water at a ratio of 1 gallon biocide: 100 gallons of water.

The biocide dipping process shall have a VOC limit of 0.9 tons VOC/yr, on a 12 month rolling total. Different biocide chemicals may be used without a license change, but emissions from the process must remain under the VOC limit of 0.9 tons/year.

*Periodic Monitoring*

Periodic monitoring for the biocide dipping process shall include monthly and 12 month rolling total records indicating the usage of biocide, the percent by weight VOC and HAP content of the biocide, and the total VOC and HAP emitted.

L. Parts Washer

Robbins Lumber makes use of a parts washer in the maintenance shop. If the solvent used in this, or any other cold cleaning parts washer brought into the facility, is below 5% by weight of VOCs then *Solvent Cleaners*, 06-096 CMR 130 (last amended June 28, 2004) is not applicable. If the solvent content is above 5% by weight VOC, then 06-960 CMR 130 is applicable.

*Periodic Monitoring*

Periodic monitoring for the degreaser units shall consist of recordkeeping to document VOC content of the solvent. If the solvent content is over 5% by weight of VOC, then recordkeeping shall also include documentation of the amount of solvent added and removed.

M. Facility Emissions

Annual facility licensed emissions from Robbins Lumber were calculated based on a 48,000 tons/year wood fuel limit for the boilers (4500 Btu/lb at 50% moisture), a 1200 hrs/year operational limit for the generator, and VOC limits for the kilns and dip tank.

**Total Licensed Annual Emissions for the Facility**  
**Tons/year**  
(used to calculate the annual license fee)

	<b>PM</b>	<b>PM<sub>10</sub></b>	<b>SO<sub>2</sub></b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>VOC</b>
Boilers	43.4	43.4	1.8	65.0	161.1	21.5
Generator	1.3	1.3	0.6	21.3	9.5	1.0
Drying Kilns	-	-	-	-	-	45.2
Biocide Dip Unit	-	-	-	-	-	0.9

<b>Total TPY</b>	<b>44.7</b>	<b>44.7</b>	<b>2.4</b>	<b>86.3</b>	<b>170.6</b>	<b>68.6</b>
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**Facility-Wide HAPs**

	<b>Tons/yr</b>
Individual HAP	9.9
Total HAPs	24.9

**III. AIR QUALITY ANALYSIS**

Robbins Lumber previously submitted an ambient air quality analysis demonstrating that emissions from the facility, in conjunction with all other sources, do not violate ambient air quality standards. The most recent ambient air quality analysis was included in air emission license A-156-71-M-A (June 14, 2001) when generator hours were increased from 500 to 1200 hours. Subsequent changes were made to the generator size and location, but no additional analysis was required per air emission license A-156-71-N-A (November 20, 2001). Generator CO emissions were recalculated for the Initial Title V license, but no modeling was required. An ambient air quality analysis is not required for this Part 70 License renewal.

## ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that emissions from this source:

- will receive Best Practical Treatment;
- will not violate applicable emissions standards
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants the Part 70 License A-156-70-C-R pursuant to 06-096 CMR 140 and the preconstruction permitting requirements of 06-096 CMR 115 and subject to the standard and special conditions below.

All federally enforceable and State-only enforceable conditions in existing air licenses previously issued to Robbins Lumber, Inc. pursuant to the Department's preconstruction permitting requirements in 06-096 CMR 108 or 115 have been incorporated into this Part 70 license, except for such conditions that MEDEP has determined are obsolete, extraneous or otherwise environmentally insignificant, as explained in the findings of fact accompanying this permit. As such the conditions in this license supercede all previously issued air license conditions.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in 06-096 CMR 115 for making such changes and pursuant to the applicable requirements in 06-096 CMR 140.

For each standard and special condition which is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only.**

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

## STANDARD STATEMENTS

- (1) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either

the control technology analysis or the ambient air quality standards analysis, or both; [06-096 CMR 140]

- (2) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege; [06-096 CMR 140]
- (3) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable. [06-096 CMR 140]
- (4) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license; [06-096 CMR 140]
- (5) Notwithstanding any other provision in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement. [06-096 CMR 140]
- (6) Compliance with the conditions of this Part 70 license shall be deemed compliance with any Applicable requirement as of the date of license issuance and is deemed a permit shield, provided that:
  - A. Such Applicable and state requirements are included and are specifically identified in the Part 70 license, except where the Part 70 license term or condition is specifically identified as not having a permit shield; or
  - B. The Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.

Nothing in this section or any Part 70 license shall alter or effect the provisions of Section 303 of the CAA (emergency orders), including the authority of EPA under Section 303; the liability of an owner or operator of a source for any violation of Applicable requirements prior to or at the time of permit issuance; or the ability of EPA to obtain information from a source pursuant to Section 114 of the CAA.

The following requirements have been specifically identified as not applicable based upon information submitted by the licensee in an application dated October 28, 1998.

	SOURCE	CITATION	DESCRIPTION	BASIS FOR DETERMINATION
i.	Boilers #1 and #2	40 CFR Part 60 Subpart Dc	Standards of Performance for Small Industrial- Commercial-Institutional Steam Generating Units	Commenced construction prior to June 9, 1989
ii.	Boilers #1 and #2	06-096 CMR 138	NO <sub>x</sub> RACT	Facility is limited to less than 100 tons NO <sub>x</sub> /year
iii.	Drying Kilns	06-096 CMR 134	VOC RACT	Kiln drying activities are exempt from VOC RACT regulation

[06-096 CMR 140]

- (7) The Part 70 license shall be reopened for cause by the Department or EPA, prior to the expiration of the Part 70 license, if:
- A. Additional Applicable requirements under the CAA become applicable to a Part 70 major source with a remaining Part 70 license term of 3 or more years. However, no opening is required if the effective date of the requirement is later than the date on which the Part 70 license is due to expire, unless the original Part 70 license or any of its terms and conditions has been extended pursuant to 06-096 CMR 140;
  - B. Additional requirements (including excess emissions requirements) become applicable to a Title IV source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 license;
  - C. The Department or EPA determines that the Part 70 license contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 license; or
  - D. The Department or EPA determines that the Part 70 license must be revised or revoked to assure compliance with the Applicable requirements.

The licensee shall furnish to the Department within a reasonable time any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 license or to determine compliance with the Part 70 license.

[06-096 CMR 140]

- (8) No license revision or amendment shall be required, under any approved economic incentives, marketable licenses, emissions trading and other similar



programs or processes for changes that are provided for in the Part 70 license.  
[06-096 CMR 140]

#### STANDARD CONDITIONS

- (1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions and this license (38 M.R.S.A. §347-C);

- (2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 140; [06-096 CMR 140]

- (3) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request; [06-096 CMR 140]

**Enforceable by State-only**

- (4) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to 38 M.R.S.A. §353.
- (5) The licensee shall maintain and operate all emission units and air pollution control systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions; [06-096 CMR 140]

**Enforceable by State-only**

- (6) The licensee shall retain records of all required monitoring data and support information for a period of at least six (6) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 license. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license; [06-096 CMR 140]
- (7) The licensee shall comply with all terms and conditions of the air emission license. The submission of notice of intent to reopen for cause by the Department, the filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an

application by the licensee for the renewal of a Part 70 license or amendment shall not stay any condition of the Part 70 license. [06-096 CMR 140]

- (8) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:

A. perform stack testing under circumstances representative of the facility's normal process and operating conditions:

1. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions;
2. to demonstrate compliance with the applicable emission standards; or
3. pursuant to any other requirement of this license to perform stack testing.

B. install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and

C. submit a written report to the Department within thirty (30) days from date of test completion.

[06-096 CMR 140]

**Enforceable by State-only**

- (9) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicates emissions in excess of the applicable standards, then:

A. within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and

B. the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that

there were intervening days during which no violation occurred or that the violation was not continuing in nature; and

- C. the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

[06-096 CMR 140]

**Enforceable by State-only**

- (10) The licensee shall maintain records of all deviations from license requirements. Such deviations shall include, but are not limited to malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emission unit itself that is not consistent with the terms and conditions of the air emission license.

- A. The licensee shall notify the Commissioner within 48 hours of a violation of any emission standard and/or a malfunction or breakdown in any component part that causes a violation of any emission standard, and shall report the probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation;

- B. The licensee shall submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component part causes a violation of any emission standard, together with any exemption requests.

Pursuant to 38 M.R.S.A. § 349(9), the Commissioner may exempt from civil penalty an air emission in excess of license limitations if the emission occurs during start-up or shutdown or results exclusively from an unavoidable malfunction entirely beyond the control of the licensee and the licensee has taken all reasonable steps to minimize or prevent any emission and takes corrective action as soon as possible. There may be no exemption if the malfunction is caused, entirely or in part, by poor maintenance, careless operation, poor design or any other reasonably preventable condition or preventable equipment breakdown. The burden of proof is on the licensee seeking the exemption under this subsection.

- C. All other deviations shall be reported to the Department in the facility's semiannual report.

[06-096 CMR 140]

- (11) Upon the written request of the Department, the licensee shall establish and maintain such records, make such reports, install, use, and maintain such

monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status. [06-096 CMR 140]

- (12) The licensee shall submit semiannual reports of any required periodic monitoring. All instances of deviations from Part 70 license requirements must be clearly identified in such reports. All required reports must be certified by a responsible official. [06-096 CMR 140]
- (13) The licensee shall submit a compliance certification to the Department and EPA at least annually, or more frequently if specified in the applicable requirement or by the Department. The compliance certification shall include the following:
  - A. The identification of each term or condition of the Part 70 license that is the basis of the certification;
  - B. The compliance status;
  - C. Whether compliance was continuous or intermittent;
  - D. The method(s) used for determining the compliance status of the source, currently and over the reporting period; and
  - E. Such other facts as the Department may require to determine the compliance status of the source;[06-096 CMR 140]

#### **SPECIAL CONDITIONS**

- (14) **Wood Boilers #1 and #2** (21.3 MMBtu/hr and 49.3 MMBtu/hr, respectively)
  - A. Fuel Use
    - 1. Robbins Lumber shall not exceed a total annual fuel limit of 48,000 tons of wet wood at 50% moisture per year (4500 Btu/lb), or equivalent, in boilers #1 and #2, based on a 12 month rolling total. [06-096 CMR 140, BPT and A-156-71-L-A (Feb. 28, 2001)]
    - 2. As a periodic monitoring requirement, Robbins Lumber shall maintain a log documenting monthly fuel use and annual fuel use based on a 12 month rolling total. Compliance shall be demonstrated by fuel quantity records including weight of fuel delivered to the fuel storage building. [06-096 CMR 140, BPT]
    - 3. Robbins Lumber may fire up to 200 gallons per month (2400 gallons per year based on a 12 month rolling total) of specification waste oil in Boiler #2. [06-096 CMR 140, BPT] **Enforceable by State-only**
    - 4. As a periodic monitoring requirement, Robbins shall maintain records documenting the amount of waste oil fired on a monthly and 12 month rolling total basis. [06-096 CMR 140, BPT] **Enforceable by State-only**

5. Only specification waste oil generated by Robbins Lumber (from Robbins Lumber owned trucks and other Robbins Lumber owned operating motorized equipment) shall be fired in Boiler #2. A sample waste oil test result shall be kept on file at the facility demonstrating compliance with the requirements of specification waste oil. Upon the Department's request, Robbins Lumber shall test additional representative samples of the waste oil. [06-096 CMR 140, BPT] **Enforceable by State-only**

B. Emissions from Boilers #1 and #2 shall be limited to the following:

<u>Pollutant</u>	<u>lb/MMBtu</u>	<u>Origin and Authority</u>	<u>Enforceability</u>
PM	0.2	06-096 CMR 103	-
NO <sub>x</sub>	0.3	06-096 CMR 140, BPT	Enforceable by State-only

**Boiler #1 lb/hr limits**

<u>Pollutant</u>	<u>lb/hr</u>	<u>Origin and Authority</u>	<u>Enforceability</u>
PM	4.3	06-096 CMR 140, BPT	Enforceable by State-only
PM <sub>10</sub>	4.3	06-096 CMR 140, BPT	Enforceable by State-only
SO <sub>2</sub>	0.2	06-096 CMR 140, BPT	Enforceable by State-only
NO <sub>x</sub>	6.5	06-096 CMR 140, BPT	Enforceable by State-only
CO	7.1	06-096 CMR 140, BPT	Enforceable by State-only
VOC	2.1	06-096 CMR 140, BPT	Enforceable by State-only

**Boiler #2 lb/hr limits**

<u>Pollutant</u>	<u>lb/hr</u>	<u>Origin and Authority</u>	<u>Enforceability</u>
PM	9.9	06-096 CMR 140, BPT; A-156-72-C-A/R (April 28, 1988)	-
PM <sub>10</sub>	9.9	06-096 CMR 140, BPT; A-156-72-C-A/R (April 28, 1988)	-
SO <sub>2</sub>	0.4	06-096 CMR 140, BPT; A-156-72-C-A/R (April 28, 1988)	-
NO <sub>x</sub>	14.9	06-096 CMR 140, BPT; A-156-74-D-R (Sept. 21, 1995)	-
CO	36.8	06-096 CMR 140, BPT; A-156-72-C-A/R (April 28, 1988)	-
VOC	4.9	06-096 CMR 140, BPT; A-156-72-C-A/R (April 28, 1988)	-

- C. Robbins Lumber shall operate boilers #1 and #2 such that the visible emissions from either boiler does not exceed 30% opacity on a six (6) minute block average basis, for more than (2) two (6) six-minute block averages in a 3-hour period. [06-096 CMR 101]
- D. As a periodic monitoring requirement, Robbins Lumber shall inspect operations of the multicyclones once a month and shall record the inspection findings in a maintenance log. The maintenance log shall contain information on maintenance, failures, and corrective action. [06-096 CMR 140, BPT]
- E. Robbins Lumber shall perform PM stack testing on Boiler #2 one time during the term of this license using the appropriate EPA test methods. [06-096 CMR 140, BPT]

(15) **Generator** (18.7 MMBtu/hr)

A. Operating Time

- 1. Robbins Lumber shall equip, operate and maintain an operating time meter on the diesel generator. The generator shall be limited to 1200 hours of operation per year, based on a 12 month rolling total.
- 2. As a periodic monitoring requirement, records shall be maintained documenting the hours of operation of the generator on a monthly and 12 month rolling total basis.

[06-096 CMR 140, BPT and A-156-71-N-A (Dec. 20, 2001)]

B. Fuel

- 1. Robbins Lumber shall fire diesel fuel with a sulfur content not to exceed 0.05% sulfur by weight in the generator.
- 2. As a periodic monitoring requirement, Robbins Lumber shall maintain records indicating the amount of diesel fuel fired on a monthly and 12 month rolling total basis. The fuel records shall consist of fuel purchase dates, amount of fuel purchased, and sulfur content.

[06-096 CMR 140, BPT and A-156-71-N-A (Dec. 20, 2001)]

C. Emissions from the diesel generator shall be limited to the following:

<u>Pollutant</u>	<u>lb/MMBtu</u>	<u>Origin and Authority</u>	<u>Enforceability</u>
PM	0.12	06-096 CMR 103	-

**Diesel Generator**

<b>Pollutant</b>	<b>lb/hr</b>	<b>Origin and Authority</b>	<b><u>Enforceability</u></b>
PM	2.2	06-096 CMR 140, BPT	-
PM <sub>10</sub>	2.2	06-096 CMR 140, BPT	-
SO <sub>2</sub>	1.0	06-096 CMR 140, BPT*	-
NO <sub>x</sub>	35.5	06-096 CMR 140, BPT*	-
CO	15.9	06-096 CMR 140, BPT*	-
VOC	1.7	06-096 CMR 140, BPT*	-

\* Also A-156-71-N-A (Dec. 20, 2001) and A-156-70-A-I (Dec. 20, 2002)

- D. Visible emissions from the diesel generator unit shall not exceed 20% opacity on a 6-minute block average, except for no more than 2 six-minute block averages in a 3-hour period. [06-096 CMR 101]
- E. The generator shall exhaust through a stack that is at least 15.2 meters tall. [A-156-71-N-A (Dec. 20, 2001)]

**(16) Drying Kilns**

- A. Robbins Lumber shall be limited to processing not more than a total of 40 MMBF per year of lumber in the kilns based on a 12 month rolling total. [06-096 CMR 140, BPT]
- B. As a periodic monitoring requirement, Robbins Lumber shall maintain a kiln log that shall include quantities of wood dried in board feet on a monthly and 12 month rolling total basis. [06-096 CMR 140, BPT]

**(17) Process Equipment** (blower, conveyor, and cyclone systems; and storage silos)

- A. Visible emissions from any general process source (including the wood waste blowers, conveyor, and cyclone systems; and the storage silos) shall not exceed an opacity of 10% on a 6-minute block average basis. [06-096 CMR 140, BPT]
- B. As a periodic monitoring requirement, Robbins Lumber shall inspect operations of the blower, conveyor, and cyclone systems and the storage silos once a month and shall record the inspection findings in a maintenance log. The maintenance log shall contain information on maintenance, failures, and corrective action. [06-096 CMR 140, BPT]

(18) **Biocide Dipping Operations**

- A. Robbins Lumber shall not exceed VOC emissions of 0.9 tons/yr from the Biocide Dipping Operation based on a 12 month rolling total. [06-096 CMR 140, BPT]
- B. As a periodic monitoring requirement, Robbins Lumber shall keep monthly and 12 month rolling total records of VOC emissions generated from the biocide dipping operation. The records shall include monthly biocide usage and the VOC content of the biocide. [06-096 CMR 140, BPT]
- C. As a periodic monitoring requirement, Robbins Lumber shall keep monthly and 12 month rolling total records of HAPs generated from the biocide dipping operation. The records shall include monthly biocide usage and the HAP content of the biocide. [06-096 CMR 140, BPT]

(19) **Parts Washer**

Parts washers at Robbins Lumber are subject to *Solvent Cleaners*, 06-096 CMR 130 (last amended June 28, 2004) if solvents used are greater than 5% VOC by weight.

- A. Robbins Lumber shall keep records of the VOC content of solvents used. If the solvent content is greater than 5% VOC by weight, Robbins Lumber shall also keep records of the amount of solvent added to each parts washer. [06-096 CMR 115, BPT]
- B. The following are exempt from the requirements of 06-096 CMR 130 [06-096 CMR 130]:
  - 1. Solvent cleaners using less than two liters (68 oz) of cleaning solvent with a vapor pressure of 1.00 mmHg, or less, at 20° C (68° F);
  - 2. Wipe cleaning; and,
  - 3. Cold cleaning machines using solvents containing less than or equal to 5% VOC by weight.
- C. The following standards apply to cold cleaning machines that are applicable sources under 06-096 CMR 130.
  - 1. Robbins Lumber shall attach a permanent conspicuous label to each unit summarizing the following operational standards [06-096 CMR 130]:
    - (i) Waste solvent shall be collected and stored in closed containers.
    - (ii) Cleaned parts shall be drained of solvent directly back to the cold cleaning machine by tipping or rotating the part for at least 15 seconds or until dripping ceases, whichever is longer.
    - (iii) Flushing of parts shall be performed with a solid solvent spray that is a solid fluid stream (not a fine, atomized or shower type spray) at a pressure that does not exceed 10 psig. Flushing shall be performed only within the freeboard area of the cold cleaning machine.
    - (iv) The cold cleaning machine shall not be exposed to drafts greater than



40 meters per minute when the cover is open.

- (v) Sponges, fabric, wood, leather, paper products and other absorbent materials shall not be cleaned in the degreaser.
  - (vi) When a pump-agitated solvent bath is used, the agitator shall be operated to produce no observable splashing of the solvent against the tank walls or the parts being cleaned. Air agitated solvent baths may not be used.
  - (vii) Spills during solvent transfer shall be cleaned immediately. Sorbent material shall be immediately stored in covered containers.
  - (viii) Work area fans shall not blow across the opening of the degreaser unit.
  - (ix) The solvent level shall not exceed the fill line.
2. The remote reservoir cold cleaning machine shall be equipped with a perforated drain with a diameter of not more than six inches. [06-096 CMR 130]

**(20) Facility HAP Emissions**

- A. Robbins Lumber shall be limited to 24.9 tons/year of total HAPs and 9.9 tons/year of any individual HAP. [06-096 CMR 140, BPT]
- B. As a periodic monitoring requirement, Robbins Lumber shall keep monthly and 12 month rolling total records of HAPs emissions from the facility (including HAP emissions calculated from the biocide dipping operations, fuel burning equipment, and the drying kilns). [06-096 CMR 140, BPT]

**(21) Fugitive Emissions**

Visible emissions from a fugitive emission source (including stockpiles and roadways) shall not exceed an opacity of 20 percent, except for no more than five (5) minutes in any 1-hour period. Compliance shall be determined by an aggregate of the individual fifteen (15)-second opacity observations which exceed 20 percent in any one (1) hour. [06-096 CMR 101]

**(22) Semiannual Reporting**

- A. Robbins Lumber shall submit semiannual reports every six months to the Bureau of Air Quality. The semiannual reports are due on **January 31<sup>st</sup>** and **July 31<sup>st</sup>** of each year. The facility's designated responsible official must sign this report.
- B. The semiannual report shall be considered on-time if the postmark of the submittal is before the due date or if the report is received by the DEP within seven calendar days of the due date.

- C. Each semiannual report shall include a summary of the periodic monitoring required by this license.
- D. All instances of deviations from license requirements and the corrective action taken must be clearly identified and provided to the Department in summary form for each six-month interval.

[06-096 CMR 140]

**(23) Annual Compliance Certification**

- A. Robbins Lumber shall submit an annual compliance certification to the Department in accordance with Standard Condition (13) of this license. The initial annual compliance certification is due January 31 of each year. The facility's designated responsible official must sign this report.
- B. The annual compliance certification shall be considered on-time if the postmark of the submittal is before the due date or if the report is received by the DEP within seven calendar days of the due date. Certification of compliance is to be based on the stack testing or monitoring data required by this license. Where the license does not require such data, or the license requires such data upon request of the Department and the Department has not requested the testing or monitoring, compliance may be certified based upon other reasonably available information such as the design of the equipment or applicable emission factors.

[06-096 CMR 140]

**(24) Annual Emission Statement**

In accordance with *Emission Statements*, 06-096 CMR 137 (last amended November 8, 2008), the licensee shall annually report to the Department the information necessary to accurately update the State's emission inventory by means of:

- A. A computer program and accompanying instructions supplied by the Department; or
- B. A written emission statement containing the information required in 06-096 CMR 137.

Reports and questions should be directed to:

Attn: Criteria Emission Inventory Coordinator  
Maine DEP  
Bureau of Air Quality  
17 State House Station  
Augusta, ME 04333-0017 Phone: (207) 287-2437

The emission statement must be submitted by the date as specified in 06-096 CMR 137.

[06-096 CMR 137]

**(25) Air Toxics Emissions Statement**

If Robbins Lumber exceeds the thresholds for HAPs listed in Appendix A of 06-096 CMR 137 in an inventory year, in accordance with 06-096 CMR 137 the licensee shall report, every three years (2011, 2014, etc.) or as otherwise stated in 06-096 CMR 137, the information necessary to accurately update the State's toxic air pollutants emission inventory by means of a computer program supplied by the Department or a written emission statement containing the information required in 06-096 CMR 137.

Reports and questions should be directed to:

Attn: HAP Inventory Coordinator  
Maine DEP  
Bureau of Air Quality  
17 State House Station  
Augusta, ME 04333-0017 Phone: (207) 287-2437

[06-096 CMR 137]

**(26) General Applicable State Regulations**

The licensee is subject to the State regulations listed below.

<u>Origin and Authority</u>	<u>Requirement Summary</u>	<u>Enforceability</u>
06-096 CMR 102	Open Burning	-
06-096 CMR 109	Emergency Episode Regulation	-
06-096 CMR 110	Ambient Air Quality Standard	-
06-096 CMR 116	Prohibited Dispersion Techniques	-
38 M.R.S.A. §585-B, §§5	Mercury Emission Limit	Enforceable by State-only

(27) **Units Containing Ozone Depleting Substances**

When repairing or disposing of units containing ozone depleting substances, the licensee shall comply with the standards for recycling and emission reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioning units in Subpart B. An example of such units include refrigerators and any size air conditioner that contain CFCs. [40 CFR, Part 82, Subpart F]

(28) **Asbestos Abatement**

When undertaking Asbestos abatement activities, Robbins Lumber shall comply with the Standard for Asbestos Demolition and Renovation 40 CFR Part 61, Subpart M.

(29) **Risk Management Plan**

The licensee is subject to any applicable requirements of 40 CFR Part 68 (Risk Management Plan).

(30) **Expiration of a Part 70 license**

Robbins Lumber shall submit a complete Part 70 renewal application at least 6 months prior, but no more than 18-months prior, to the expiration of this air license.

Pursuant to Title 5 MRSA §10002, and 06-096 CMR 140, the Part 70 license shall not expire and all terms and conditions shall remain in effect until the Department takes final action on the renewal application of the Part 70 license. An existing source submitting a complete renewal application under Chapter 140 prior to the expiration of the Part 70 license will not be in violation of operating without a Part 70 license. **Enforceable by State-only**

Robbins Lumber, Inc.  
Waldo County  
Searsmont, Maine  
A-156-70-C-R

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Departmental  
Findings of Fact and Order  
Part 70 Air Emission License

(31) New Source Review

Robbins Lumber is subject to all previous New Source Review (NSR) requirements summarized in this Part 70 air emissions license and the NSR requirements remain in effect even if this 06-096 CMR 140 Air Emissions License, A-156-70-C-R, expires.

DONE AND DATED IN AUGUSTA, MAINE THIS 20th DAY OF November, 2009.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: James P. Brondino  
DAVID P. LITTELL, COMMISSIONER

**The term of this license shall be five (5) years from the signature date above.**

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: June 20, 2007

Date of application acceptance: June 20, 2007

Date filed with the Board of Environmental Protection: \_\_\_\_\_

This Order prepared by Kathleen E. Tarbuck, Bureau of Air Quality.

